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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

LING CAI, individually; JING XU, individually;
Z.X., a minor, by and through his Natural Parent,
JING XU; JENNIFER EDWARDS, as Special
Administrator of the ESTATE OF ZHONGPING
ZHOU, deceased;

Plaintiffs,

vs.

ENTERPRISE LEASING COMPANY-WEST LLC
dba ENTERPRISE dba ALAMO; ELCO
ADMINISTRATIVE SERVICES COMPANY; ACE
AMERICAN INSURANCE COMPANY; ESIS INC,
dba CHUBB NORTH AMERICAN CLAIMS;
CHUBB SERVICES CORPORATION dba CHUBB
NORTH AMERICAN CLAIMS; CHUBB
NATIONAL INSURANCE COMPANY; AND
CHUBB INDEMNITY INSURANCE COMPANY;
DOES I through X, inclusive; and ROE
CORPORATIONS I through X, inclusive,

Defendants.

Case No. : 2:23-cv-50-NJK

**STIPULATION AND ORDER TO
EXTEND TIME FOR PLAINTIFFS
TO FILE THEIR AMENDED
COMPLAINT**

Plaintiffs Ling Cai; Jing Xu; Z.X., by and through his natural parent Jing Xu; and
Jennifer Edwards, as special administrator of the Estate of Zhongping Zhou ("Plaintiffs") and
Defendants Enterprise Leasing Company-West LLC; Elco Administrative Services Company;
Ace American Insurance Company; ESIS Inc.; Chubb Services Corporation; Chubb North
American Claims; Chubb National Insurance Company; and Chubb Indemnity Insurance

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Company (collectively “Defendants”), by and through their respective counsel of record, hereby agree, stipulate, and respectfully request that the Court extend the deadline for Plaintiffs to file their Third Amended Complaint by twenty-one (21) days. This results in a new deadline of April 19, 2024.

This is the second request to extend the Third Amended Complaint deadline. The first request was rejected for failure to redact, so no prior extensions have so far been granted. The extension is necessary because the parties are in the midst of good faith discussions intended to narrow the list of Defendant companies named by Plaintiffs.

Summary of Stipulated (Proposed) Briefing Schedule:

Amended Complaint Previously Due March 29, 2024

Amended Complaint Now Due April 19, 2024

The undersigned represent that this stipulation is not designed for purposes of delay.

Dated: April 4, 2024

/s/ Michael Kane

/s/ Eric Swanis

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PER STIPULATION OF THE PARTIES, the briefing schedule is hereby set as follows: Plaintiff’s new Amended Complaint is now due on April 19, 2024.

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

Dated: April 5, 2024